

# PAUL HASTINGS

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June 3, 2020

## VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Petróleos de Venezuela, et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF  
(S.D.N.Y.)

Dear Judge Failla:

We are writing to respectfully request a further, very short extension of the summary judgment briefing schedule, which would adjust the filing of reply briefs by just two days, and thus briefing would still be completed four weeks before the hearing date (which the parties would not propose to change). Defendants have consented to the requested extension.

Two days ago, the Venezuelan home of Dr. Hernández, Special Attorney General of Venezuela, was raided by the Maduro regime in retaliation for an arbitral award recently obtained by the Guaidó Government against the regime's interests. Yesterday, Dr. Hernández's parents' home was also raided by the regime. As a result of these events, Dr. Hernández has been forced to abruptly and unexpectedly turn his attention away from plaintiffs' summary judgment filings.

The adjusted schedule would be as follows:

	<u>Current Date</u>	<u>Proposed Date</u>
Motions for summary judgment:	June 5, 2020	June 10, 2020
Oppositions to summary judgment motions:	June 25, 2020	June 29, 2020
Replies to summary judgment motions:	July 13, 2020	July 15, 2020
Hearing date for summary judgment motions:	August 12, 2020	August 12, 2020

Plaintiffs respectfully request that the Court approve the adjusted briefing schedule, and we are available to address any questions the Court may have.

Respectfully,



James R. Bliss  
of PAUL HASTINGS LLP  
cc: Counsel of record

Application GRANTED. The Court adopts the proposed briefing schedule. There will be no further extensions.

Dated: June 3, 2020  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE